

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**DWAYNE WILLIAMS and KARLA
VARGAS,**

Plaintiffs

vs.

**ABC LLC d/b/a KIDS EMPIRE and HAIM
ELBAZ,**

Defendants.

Civil Action No.:2:22-cv-05327-EP-JSA

**CERTIFICATION OF CORINNE RAMIREZ IN SUPPORT OF DEFENDANT'S
MOTION IN OPPOSITION OF PLAINTIFFS' MOTION FOR REMAND**

I, Corinne Ramirez of full age, certify as follows:

1. I am the Risk Management Director of ABC LLC d/b/a Kids Empire LLC. I am personally familiar with the matters asserted herein and submit this Certification in support of Kids Empire LLC's Motion in Opposition of Plaintiffs' Motion for Remand. The attached are documents concerning the pay rate of Plaintiffs Dwayne Williams and Karla Vargas.
2. Exhibit A contains a document describing Plaintiff Karla Vargas' pay-rate at the time of her termination.
3. Exhibit B contains a document describing Plaintiff Dwayne Williams' pay-rate at the time of his termination.

I hereby certify the foregoing statements made by me are true. I understand that if any of the

foregoing statements made by me are willfully false, I am subject to punishment.

Dated: October 7, 2022

A handwritten signature in black ink that reads "CORINNE RAMIREZ". The signature is written in a cursive, slightly stylized font.

CORINNE RAMIREZ